

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :
: No. 3:18-CR-0097
v. :
: (Judge Mariani)
ROSS ROGGIO, and :
ROGGIO CONSULTING Co, LLC :
Defendants. : (electronically filed)

**GOVERNMENT'S RESPONSE TO DEFENDANT'S MOTION IN
LIMINE TO EXCLUDE CHRISTINA SIDIROPOULOU'S
STATEMENT TO CUSTOMS AND BORDER PROTECTION**

Defendant Ross Roggio moved *in limine* to exclude as hearsay testimony related to statements Christina Sidiropoulou made to U.S. Customs and Border Protection (CBP) when she entered the United States at JFK Airport in New York on or about February 26, 2017. Docs. 221-222.

In the statement, Sidiropoulou said that in early 2016 she moved from Greece to Sulaymaniyah, Iraq, to work as Roggio's personal assistant, and soon thereafter became Roggio's girlfriend. Since early 2016, Sidiropoulou said she had never been apart from Roggio for more than five days, with the exception of two weeks around Thanksgiving 2016 when Roggio returned to the United States. During the eleven months she lived in Sulaymaniyah and during the eight months she had

been Roggio's girlfriend, Sidiropoulou said she never feared for her safety and Roggio never expressed fear for his life or safety. Sidiropoulou said that on February 23, 2017, she flew from Sulaymaniyah to Greece to visit her parents, while Roggio stayed in Sulaymaniyah for a few more days to make sure all his projects were completed. Sidiropoulou said she and Roggio met, as planned, on February 26, 2017, at the airport in Istanbul, Turkey, to fly together to the United States.

By contrast, in a separate interview with CBP at JFK Airport on February 26, 2017, Roggio claimed that he had been kidnapped in Sulaymaniyah in December 2016, taken to an unknown location, and held against his will until February 24, 2017. Roggio claimed that during this time he was scared and thought he was going to die. Roggio claimed that he escaped by jumping out of a window at 2 a.m. and subsequently made his way out of Iraq.

The government has no intention during its case in chief of attempting to admit the CBP report of the interview of Sidiropoulou or otherwise enter her statements into evidence. As noted in the government's motions *in limine*, evidence regarding what happened

when Roggio was exiting the Kurdistan region of Iraq in December 2016 to February 2017 is irrelevant to whether he committed the crimes he is accused of committing prior to that date, such as the torture he and Kurdish soldiers carried out in October and November 2016. *See, e.g.*, Doc. 233 at 17, n.5.

However, the government reserves the right to use the material in the CBP report and related reports to cross-examine Sidiropoulou, Roggio, and other witnesses. The government does not intend to call Sidiropoulou as a witness in its case in chief, but reserves the right to call Sidiropoulou as a rebuttal witness.

Dated: April 18, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that he is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion as to be competent to serve papers.

That on April 18, 2023, he served a copy of the above document via ECF on Gino Bartolai, Esq., counsel for defendants.

s/ Todd K. Hinkley
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